COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Telecommunications and Energy on its own Motion into the Appropriate Pricing, based upon Total Element Long-Run Incremental Costs, for Unbundled Network Elements and Combinations of Unbundled Network Elements, and the Appropriate Avoided Cost Discount for Verizon New England, Inc. d/b/a Verizon Massachusetts' Resale Services in the Commonwealth of Massachusetts	D.T.E. 01-20

AT&T's FOURTEENTH SET OF INFORMATION

REQUESTS TO VERIZON

AT&T Communications of New England, Inc. hereby submits the following information requests to Verizon. Please provide responses to these requests as they are completed.

Instructions

Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.

Please provide answers as they are completed.

These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.

If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.

If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.

If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

Unless otherwise stated, these requests concern Verizon's Massachusetts intrastate operations.

The page number references in the following questions are to the hard copy of the Panel Testimony that was distributed by Verizon on May 8, 2001.

INFORMATION REQUESTS

ATT-VZ 14-1. Provide a complete and functioning electronic copy of Verizon-MA's Engineering and Construction Records Information System ("ECRIS") relied on in preparing investments for elements included in the Verizon-MA TELRIC cost study.

ATT-VZ 14-2. Referring to page 23 of the Verizon-MA Panel testimony, identify the amount of "administrative spare" included in Verizon-MA's engineering capacity and planning.

ATT-VZ 14-3. Identify which of the factors identified on page 23 of the Panel testimony (forecast uncertainties, customer inward-outward movement, random fluctuations in demand, future growth, maintenance requirements and other factors) are accommodated by the level of administrative spare included in Verizon-MA's engineering capacity planning.

ATT-VZ 14-4. State whether the level of administrative spare varies by feeder route or wire center in Verizon-MA's engineering capacity planning? If the answer is anything but an unqualified no, explain in detail the process Verizon-MA uses to establish the appropriate level of administrative spare for each feeder route or wire center.

ATT-VZ 14-5. At page 24 of the Verizon-MA Panel testimony, the Panel explains that at any point in time, some network systems will have just had a capacity addition, while others will be approaching exhaust. With reference to this testimony:

(a) Identify the distribution areas in the Verizon-MA service territory that have experienced a capacity addition since January 1, 1999.

(b) Provide copies of the actual outside plant estimate cases for each capacity addition identified, including the total cost of the capacity addition.

(c) Identify the average distribution area distribution fill immediately preceding the capacity addition and immediately following the capacity addition.

ATT-VZ 14-6. Identify the distribution areas in the Verizon-MA service territory that Verizon-MA forecasts will exhaust during the next two years. For each distribution area identified, provide the current average distribution fill level, the forecasted fill at the time of projected exhaust and the anticipated fill factor immediately following the proposed capacity addition. Also, where available, provide copies of outside plant estimate cases or other Verizon-MA authorizations for expenditure for the anticipated capacity addition projects.

ATT-VZ 14-7. Provide a copy of Verizon-MA's current outside plant engineering guidelines.

ATT-VZ 14-8. Referring to page 25 of the Verizon-MA Panel testimony, provide a copy of Verizon-MA's current policies for efficiently dealing with the anticipated reduction in average utilization of network capacity expected from increased levels of customer churn driven by increased levels of local competition.

ATT-VZ 14-9. Referring to the forward-looking network underlying Verizon-MA's TELRIC costs, and to page 26 of the Verizon-MA Panel testimony, explain what steps have been taken to adjust Verizon-MA's actual utilization levels to eliminate the unutilized facilities in the embedded plant resulting from the installation of additional network capacity with the latest technology.

ATT-VZ 14-10. Referring to page 29 of the Verizon-MA Panel testimony, provide details of the ten largest hardwired equipment installations for 1998 included in the Verizon-MA Detailed Continuing Property Records ("DCPR") database upon which forward-looking EF&I were developed.

ATT-VZ 14-11. Referring to page 29 of the Verizon-MA Panel testimony, provide details of the ten largest plug-in equipment installations for 1998 included in the Verizon-MA Detailed Continuing Property Records ("DCPR") database upon which forward-looking EF&I were developed.

ATT-VZ 14-12. Identify separately the actual average discount for Digital Circuit equipment, Digital Switch and SONET Circuit and other terminal equipment - CPE reflected in the 1998 DCPR installed investment for hardwired and plug-in equipment upon which the forward-looking EF&I factors were developed.

ATT-VZ 14-13. Referring to page 32 of the Verizon-MA Panel testimony, identify the actual average discount for electronic switching, operator systems and circuit account investments used in the development of the forward-looking land and building factor.

ATT-VZ 14-14. Referring to page 33 of the Verizon-MA Panel testimony, provide details of the ten largest hardwired equipment installations for 1998 included in the Verizon-MA Detailed Continuing Property Records ("DCPR") database upon which forward-looking power factors were developed.

ATT-VZ 14-15. Referring to page 33 of the Verizon-MA Panel testimony, provide details of the ten largest plug-in equipment installations for 1998 included in the Verizon-MA Detailed Continuing Property Records ("DCPR") database upon which forward-looking power factors were developed.

ATT-VZ 14-16. Provide copies of all studies or analyses conducted by Verizon-MA supporting the 5% downward reduction for copper cable "R" dollars.

ATT-VZ 14-17. Provide copies of all studies conducted by Verizon-MA indicating the actual reduction in "R" dollars experienced when newly placed cables replace exhausted and/or deteriorated cables.

ATT-VZ 14-18. Provide details of all circumstances in calendar year 1999 in which Verizon-MA was reimbursed by a municipality or customer for reconfigurations, moves, changes or upgrades. Identify the amount of each reimbursement and explain where such reimbursements are recorded in Verizon-MA's accounting records.

ATT-VZ 14-19. Provide all studies and other information from the recently litigated New York UNE proceeding which suggest that a ratio of between 75% and 80% is a reasonable approximation of the likely relationship between the total plant investments in a TELRIC filing to total plant investment contained in Verizon-MA's accounting records.

ATT-VZ 14-20. Provide documentation supporting the assertion at page 79 of the Verizon-MA Panel testimony that average residential demand is 1.2 lines per living unit.

ATT-VZ 14-21. Provide the average business demand in terms of the average number of business lines per business (or business unit).

ATT-VZ 14-22. Provide a five year forecast of anticipated future demand within the Verizon-MA service territory. Also provide this same information at the individual wire center level.

ATT-VZ 14-23. Provide the average growth in demand actually experienced by Verizon-MA for each wire center (by year) for the last 5 years.

ATT-VZ 14-24. Provide all documentation supporting the 55.2% copper feeder utilization factor used by Verizon-MA in its forward-looking TELRIC study.

ATT-VZ 14-25. Provide all documentation supporting the 60% fiber utilization factor used by Verizon-MA in its forward-looking TELRIC study.

ATT-VZ 14-26. Provide documents identifying Verizon-MA's actual Remote Terminal plug-in equipment utilization.

ATT-VZ 14-27. Provide all details, including all responsive documents (in both electronic and hard copy format), supporting the calculation of the installed cost per cable foot used by the loop cost model as described at page 87 of the Verizon-MA Panel testimony.

ATT-VZ 14-28. Provide all details, including all responsive documents (in both electronic and hard copy format), supporting the calculation of installed cross-box, terminal and pole costs as described at page 87 of the Verizon-MA Panel testimony.

ATT-VZ 14-29. Referring to page 88 of the Verizon-MA Panel testimony, provide all details, including all responsive documents (in both electronic and hard copy format), supporting the number of loop and transport pair feet of cable assumed for the forward-looking cost study.

ATT-VZ 14-30. Referring to page 88 of the Verizon-MA Panel testimony, provide all details, including all responsive documents (in both electronic and hard copy format), supporting the calculation of the portion of the outside plant structure investment owned solely by Verizon-MA versus the portion owned jointly or owned solely by other utility companies.

ATT-VZ 14-31. Provide copies of all instructions, forms, manuals or other documentation (in both electronic and hard copy format) provided to Verizon-MA's engineers relating to the survey of feeder route data conducted by the Verizon-MA engineers.

ATT-VZ 14-32. Provide copies of all materials (plats, network diagrams, demand forecasts, engineering guidelines, maps, etc.)(in both electronic and hard copy format) reviewed or otherwise used by the Verizon-MA engineers in conducting the survey of feeder route data.

ATT-VZ 14-33. Provide copies of all survey related materials (i.e., survey results)(in both electronic and hard copy format) produced by the Verizon-MA engineers to the Verizon-MA personnel responsible for recording, auditing and summarizing the survey results.

ATT-VZ 14-34. Provide a detailed description of the types of lines included as "actual assigned circuits" as the term is used at page 91, line 12 of the Verizon-MA Panel testimony. Specifically, state whether assigned circuits include:

(a) Working Lines

(b) Administrative Pairs

(c) Defective Pairs

(d) Other (describe)

ATT-VZ 14-35. Explain the difference between "working lines" as the term is used on line 17 of page 91 of the Panel testimony and "actual assigned circuits" as that term is used on line 12 of page 91.

ATT-VZ 14-36. Explain how the feeder and distribution structure mixes by wire center were developed for each CSA.

ATT-VZ 14-37. Provide an estimate (by wire center or density zone, if available) of the percentage of house and riser cable in the Verizon-MA service territory actually owned by Verizon-MA.

ATT-VZ 14-38. State whether the distribution lengths in the Verizon Loop Cost Study include house and riser cable lengths? If yes, how were such lengths determined?

ATT-VZ 14-39. State whether the Verizon-MA cost study assumes placement of multiple smaller feeder cables in place of a larger feeder cable that is capable of serving forecasted demand. If the answer is yes, state whether it is Verizon's position that this practice represents the most efficient means of constructing outside plant?

ATT-VZ 14-40. Approximately what percentage of Verizon-MA's existing distribution plant was relieved in the year 2000?

ATT-VZ 14-41. Of the percentage of Verizon-MA existing distribution plant relieved in the year 2000, approximately what percentage of those relief jobs were caused by deteriorated plant?

ATT-VZ 14-42. Of the percentage of Verizon-MA existing distribution plant relieved in the year 2000, approximately what percentage of those relief jobs were caused by distribution plant exhaust?

ATT-VZ 14-43. Of the percentage of Verizon-MA existing distribution plant relieved in the year 2000, approximately what percentage of those relief jobs were caused by a combination of deteriorated plant and distribution plant exhaust?

ATT-VZ 14-44. Provide electronic versions of all Excel spreadsheets or workbooks supporting Verizon-MA Input Factors to the TELRIC Loop Cost Study.

Respectfully submitted,

AT&T COMMUNICATIONS OF NEW ENGLAND, INC.

By its attorneys,

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